

**EXHIBIT F**

Jayne L. Freeman

**From:** Derek C. Chen  
**Sent:** Wednesday, August 8, 2018 10:06 AM  
**To:** joe@joethomas.org; Jayne L. Freeman  
**Cc:** LaHoma Walker  
**Subject:** RE: Dalessio v. University of WA, Case No. 2:17-cv-00642-MJP

Thank you for your email.

First, we did put an identifier in each response that we supplemented. If you read the document, we designated each supplemental response with "**SUPPLEMENTAL RESPONSE**" (in all caps, underlined, and bold font) so it would be easily identifiable.

Second, we bates-stamped the Administrative Policy Statement document we sent you in the bottom right-hand corner. If you look at the discovery responses, you'll see we then cited those bates numbers so you would know exactly which RFP they were responsive to. See below.

9. Please produce all documents identifying Public Records Act policies, procedures, training manuals of the University of Washington or any sub-agency of the University of Washington pursuant to RCW 42.56.010(1) from January 01, 2003 to June 04, 2018.

**RESPONSE:** Objection, this request is vague and overbroad. Without waiving these objections, The Office of Public records relies on RCW 42.56, WAC 478-276 and documents bates-stamped UW0002953-UW0002959 (glossary of excerpts from RCW 42.56) as a guiding source for policies, procedures and training. If necessary, the Office also may research or refer to additional statutory references as needed. See also, attached Document Nos. 4155-4165. This response may be supplemented as necessary.

**SUPPLEMENTAL RESPONSE:** Without waiving the above-listed objections, see documents bates-stamped UW004462-UW004467.

Hopefully this clarifies any confusion on your part.

Sincerely,

Derek

*Derek C. Chen*

**KBM** KEATING, BUCKLIN  
& McCORMACK

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**From:** joe@joethomas.org <joe@joethomas.org>

**Sent:** Wednesday, August 8, 2018 9:27 AM

**To:** Jayne L. Freeman <JFreeman@kbmlawyers.com>

**Cc:** Derek C. Chen <DChen@kbmlawyers.com>; LaHoma Walker <LWalker@kbmlawyers.com>; 'JULIE' <juliedalessio@msn.com>

**Subject:** RE: Dalessio v. University of WA, Case No. 2:17-cv-00642-MJP

Dear Jayne:

This supplemental discovery sent on August 06, 2018 is simply unacceptable.

First, there is no identifier for me to know what is supplemented and is not supplemented. As Ms. Dalessio's pro bono attorney, it is a waste of my time to determine what you are supplementing. It is your duty in order to inform me what you are supplementing, since these are your responses.

Additionally, attached to the email with the supplemental discovery on August 06, 2018 there is an "Administrative Policy Statement" concerning the release of documents. This document does not appear to be identified in discovery. The document is titled 374474 and that document title does not appear anywhere in the text of the supplemental discovery. It is unclear if this document is produced in response to a particular interrogatory, to a request for production of documents, or if it is just something not requested that you wanted to share. There needs to be context with the documents that you provide.

**Sent:** Wednesday, August 8, 2018 9:27 AM

Please respond at your earliest convenience so that we may continue with discovery as expeditiously as possible.

**Cc:** Derek C. Chen

Very truly yours,

**Subject:** RE: Dalessio v. University of WA, Case No. 2:17-cv-00642-MJP

Joe

Respectfully,

Joseph Thomas

Law Office of Joseph Thomas PLLC



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Renton, Washington 98058  
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Website: <http://JoeThomas.org>

NOTICE: This communication may contain privileged or other confidential information. If you have received it in error, please advise the sender by reply email and immediately delete the message and any attachments without copying it or disclosing its contents to others. Thank you.

From: LaHoma Walker <[LWalker@kbmlawyers.com](mailto:LWalker@kbmlawyers.com)>  
Sent: Monday, August 6, 2018 3:42 PM  
To: [joe@joethomas.org](mailto:joe@joethomas.org)  
Cc: Jayne L. Freeman <[JFreeman@kbmlawyers.com](mailto:JFreeman@kbmlawyers.com)>; Derek C. Chen <[DChen@kbmlawyers.com](mailto:DChen@kbmlawyers.com)>  
Subject: Dalessio v. University of WA, Case No. 2:17-cv-00642-MJP

Good afternoon.

Attached please find Defendants' Objections and First Supplemental Responses Thereto Plaintiff's First Set of Discovery Requests and responsive documents, a copy of which has also been sent to you via First Class U.S. mail.

Thank you.

**LaHoma Walker**  
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Jayne L. Freeman  
Kimberly J. Waldbaum  
Michael C. Walter  
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